

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ANTHONY CAIRNS,)	
)	
Plaintiff,)	
)	CIVIL ACTION
vs.)	
)	FILE No. 3:19-CV-1922
BELTLINE HOLDINGS, LTD.,)	
)	
Defendant.)	

**JOINT STIPULATION TO APPROVE CONSENT DECREE
AND TO DISMISS DEFENDANT WITH PREJUDICE**

Plaintiff, **ANTHONY CAIRNS** (“Plaintiff”) and Defendant, **BELTLINE HOLDINGS, LTD.** (“Defendant”) (collectively, the “Parties”), hereby file this Joint Stipulation seeking the Court’s Approval of the parties’ Consent Decree and to Dismiss Defendant, BELTLINE HOLDINGS, LTD., with Prejudice:

1. Plaintiff filed the instant cause of action alleging that the Property operated and/or owned by Defendant violated Title III of the Americans with Disabilities Act, 42 U.S.C. § 12181 *et seq.*
2. The matters raised by Plaintiff’s Complaint have been resolved in accordance with the Consent Decree (“Settlement”) attached hereto as Exhibit “1”.
3. In accordance therewith, the Parties request that the Court review, approve and ratify the Consent Decree. Additionally, the Parties request the Court retain jurisdiction to enforce the terms of the Settlement. This Settlement is conditioned upon the Court’s retaining jurisdiction to enforce said Settlement.

4. As part of the Settlement reached between the Parties, Plaintiff has agreed to dismiss Defendant, BELTLINE HOLDINGS, LTD., with prejudice. Accordingly, the Parties request, upon the Court's review, approval and ratification of the Settlement, Defendant, BELTLINE HOLDINGS, LTD., be dismissed with prejudice.

5. Except as otherwise stated in the Settlement, each party to bear their own fees and costs.

WHEREFORE, the Parties respectfully request that this Honorable Court enter an Order approving the attached Consent Decree, dismissing the claims asserted by Plaintiff against Defendant, BELTLINE HOLDINGS, LTD., with prejudice, and retaining jurisdiction to enforce the Settlement.

Respectfully submitted this 10th day of November, 2019.

Law Offices of
THE SCHAPIRO LAW GROUP, P.L.

/s/ Douglas S. Schapiro
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CERTIFICATE OF SERVICE

WE HEREBY CERTIFY, a true and correct copy of the above and foregoing has been filed electronically the Clerk of the Court using CM/ECF/system on this 10th day of November, 2019.

/s/ Douglas S. Schapiro
Douglas S. Schapiro, Esq.
No. District of Texas ID No. 54538FL